

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PDV USA, INC.,

Plaintiff,

v.

INTERAMERICAN CONSULTING, INC.,

Defendant.

Case No. 20-cv-03699 (JGK)

DEFENDANT'S PRIVILEGE LOG

Defendant, INTERAMERICAN CONSULTING, INC., by and through its undersigned counsel, under Local Civil Rule 26.2, hereby submits the following privilege log to Plaintiff, PDV USA, Inc., in conjunction with its Responses to Requests for Production.

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Nuevas Instrucciones Bancarias y Factura Final	9/19/18	David Rivera	Jeff Feldman	Attorney-Client
Email	Fwd: re: [EXT] RE: [EXT] Nuevas Instrucciones Bancarias y Factura Final	12/28/18	David Rivera	Jeff Feldman	Attorney-Client
Email	Fwd: re: [EXT] RE: [EXT] Nuevas Instrucciones Bancarias y Factura Final	12/31/18	David Rivera	Jeff Feldman	Attorney-Client
Email	Fwd: Nuevas Instrucciones Bancarias y Factura Final	1/31/19	David Rivera	Jeff Feldman	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Fwd: Interamerican Consulting Contract	5/23/19	David Rivera	Jeff Feldman	Attorney-Client and Work Product
Email	Fwd: Facturacion Pendiente	7/19/19	David Rivera	Jeff Feldman	Attorney-Client
Email	Re: FARA Counsel	6/15/20	David Rivera	Matthew Sanderson	Attorney-Client
Email	Re: FARA Counsel	6/15/20	David Rivera	Matthew Sanderson	Attorney-Client
Email	Re: FARA Counsel	6/15/20	David Rivera	Matthew Sanderson	Attorney-Client
Email	Re: FARA Counsel	6/15/20	David Rivera	Matthew Sanderson	Attorney-Client
Email	Retainer Letter Signature Page	8/24/20	David Rivera	Jeff Feldman, David Hecht, Lee Boyd and Inirida Cervantes	Attorney-Client
Email	RE: Draft MTD brief	9/27/20	David Rivera	Jeff Feldman	Attorney-Client
Email	Fwd: Documento de Cesion – Contrato de Servicios Profesionales de Consultoria	9/27/20	David Rivera	Jeff Feldman	Attorney-Client
Email	PDVSA DOJ Investigations	11/2/20	David Rivera	Jeff Feldman	Attorney-Client and Work Product
Email	Great Wine	12/25/20	David Rivera	Jeff Feldman and Susan Latham	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	PDVSA Ad Hoc Board Enabling Statute	1/19/21	David Rivera	Lori Weems Evers	Attorney-Client
Email	RE: FARA Counsel	1/28/21	David Rivera	Matthew Sanderson	Attorney-Client
Email	Contingency Agreements	1/28/21	David Rivera	Jeffrey Shapiro	Attorney-Client
Email	RE: FARA Counsel	1/28/21	David Rivera	Matthew Sanderson	Attorney-Client
Email	RE: Response Thoughts	2/3/21	David Rivera	Jeff Feldman	Attorney-Client
Email	Draft Counter-claim	8/16/21	David Rivera	Ralph Patino	Attorney-Client
Email	Fwd: Draft Counter-claim	8/18/21	David Rivera	Ralph Patino	Attorney-Client
Text Message	Attorney-Privileged Communication	Undated	Raul Gorrin	David Rivera Josh Goodman	Attorney-Client
Email	Re: Email Documentation	7/17/21	Esther Nuhfer	David Rivera	Attorney-Client
Email	Re: Email Documentation	7/17/21	David Rivera	Esther Nuhfer	Attorney-Client
Email	Citgo Law Suit	10/16/20	David Rivera	Esther Nuhfer	Attorney-Client
Email	Fwd: RE: [EXT] RE: [EXT] Nuevas Instrucciones Bancarias y Factura Final	12/28/18	David Rivera	Jeff Feldman and Esther Nuhfer	Attorney-Client
Email	Fwd: RE: [EXT] RE: [EXT] Nuevas Instrucciones Bancarias y Factura Final	12/30/18	David Rivera	Esther Nuhfer	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Fwd: Interamerican Consulting Contract	2/18/19	David Rivera	Jeff Feldman and Esther Nuhfer	Attorney-Client
Email	FW: 1 New Docket Entry for PDV USA, Inc. v. Interamerican Consulting Inc. (1:20-cv-03699)	11/25/20	Lori Weems Evers	David Rivera	Attorney-Client
Email	Fraud Remedies Checklist (TX)	1/22/21	Lori Weems Evers	David Rivera	Attorney-Client
Email	RE: How did we forget to mention the attached to me?	1/23/21	Lori Weems Evers	David Rivera	Attorney-Client
Email	2021-01-25 PDV USA Memorandum of Law in Opp Mtn to Strike Allegations	1/29/21	Lori Weems Evers	David Rivera	Attorney-Client
Email	Fwd: Re: PDV USA/Citgo Lawsuit Representation	11/13/20	David Rivera	Lori Weems Evers	Attorney-Client
Email	Re: Draft Affirmative Defenses	8/16/21	David Rivera	Lori Weems Evers	Attorney-Client
Email	PDV USA/Citgo	6/15/20	David Rivera	Lori Weems Evers	Attorney-Client and Work Product
Email	FW: PDV USA v. Interamerican	6/10/20	David Rivera	Lori Weems Evers	Attorney-Client and Work Product

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: FW: PDV USA v. Interarmerican	6/10/20	David Rivera	Lori Evers	Attorney-Client and Work Product
Email	Fwd: PDV USA, Inc. v. Interamerican Consulting Inc.	5/15/20	David Rivera	Lori Evers	Attorney-Client
Email	Fwd: Rivera/PDV USA – Consulting Agreement	5/15/20	David Rivera	Lori Evers	Attorney-Client
Email	Re: Pre-Motion Hearing Transcript	10/16/20	Lori Evers	David Rivera	Attorney-Client
Email	Lori Comments	12/17/20	David Rivera	Lori Weems Evers	Attorney-Client
Email	Re: Pre-Motion Hearing Transcript	10/16/20	David Rivera	Lori Evers	Attorney-Client
Email	RE: PDV – Confidential Communication	5/19/20	David Rivera	Tucker Byrd and batista007@aol.com	Attorney-Client
Email	Fwd: FW: PDV USA v. Interamerican (20-cv-03699-JGK)	12/7/21	David Rivera	Esther Nuhfer	Attorney-Client
Email	Fwd: FW: PDV USA v. Interamerican (20-cv-03699-JGK)	12/9/21	David Rivera	Alex at Sushi Sake Miami	Attorney-Client
Email	Fwd: RE: Court Filings – PDV USA, Inc. v. Interamerican Consulting Inc. – Case 1:20-cv-03699-JGK	9/5/21	David Rivera	Esther Nuhfer	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Fwd: Interamerican/PDV USA; Initial Disclosures and Document Production	9/1/21	David Rivera	Drive056@fiu.edu	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/25/20	Michael E. DeLarco	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/25/20	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/25/20	Daniel Gildin	David Rivera, David E. Robbins and David J. Kaufmann	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/25/20	Greg Wolfe	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/27/20	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/28/20	Daniel Gildin	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/29/20	Daniel Gildin	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/29/20	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/29/20	Bryce Jones	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/30/20	Bryce Jones	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	10/13/20	Lauren Weinstein	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	10/16/20	Howard Magaliff	David Rivera	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	RE: PDV USA/Citgo Legal Representation	10/16/20	Jason Solotaroff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	10/22/20	Bryce Jones	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	11/2/20	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	11/6/20	Lauren Weinstein	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	1/14/21	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	1/15/21	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	1/19/21	Howard Magaliff	David Rivera	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Megan Siddall	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Laura Weinstein	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Greg Wolfe	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Jacob Alderice	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Hannah Waite	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Gabriela Bersuder	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Kade Olsen	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	John Thompson and J.R. Skrabanek	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Bryce Jones	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Adam Kaufmann	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Bryce Jones	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	6/16/20	David Rivera	Bryce Jones	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	6/16/20	David Rivera	Greg Wolfe	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	6/16/20	David Rivera	Lauren Weinstein	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	6/17/20	David Rivera	Lauren Weinstein	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	6/18/20	David Rivera	Greg Wolfe	Attorney-Client
Email	PDV USA/Citgo Legal Representation	7/15/20	David Rivera	William Dreyer	Attorney-Client
Email	PDV USA/Citgo Legal Representation	7/15/20	David Rivera	Todd Wengrovsky	Attorney-Client
Email	Re: PDV USA/Citgo Legal Representation	7/16/20	David Rivera	Bryce Jones	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Greg Wolfe	Attorney-Client
Email	Re: PDV USA/Citgo Lawsuit Representation	9/29/20	David Rivera	Bryce Jones	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: PDV USA/Citgo Lawsuit Representation	9/29/20	David Rivera	Bryce Jones	Attorney-Client
Email	Re: PDV USA/Citgo Lawsuit Representation	9/30/20	David Rivera	Bryce Jones	Attorney-Client
Email	RE: PDV USA/Citgo Lawsuit Representation	10/12/20	David Rivera	Lauren Weinstein	Attorney-Client
Email	RE: PDV USA/Citgo Lawsuit Representation	10/13/20	David Rivera	Lauren Weinstein	Attorney-Client
Email	RE: PDV USA/Citgo Lawsuit Representation	10/16/20	David Rivera	Lauren Weinstein	Attorney-Client
Email	RE: PDV USA/Citgo Lawsuit Representation	10/16/20	David Rivera	Bryce Jones	Attorney-Client
Email	Fwd: Re: PDV USA/Citgo Lawsuit Representation	11/13/20	David Rivera	Lori Weems Evers	Attorney-Client
Email	Re: PDV USA/Citgo Lawsuit Representation	11/13/20	David Rivera	Lauren Weinstein	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Ronald Meltzer and Reginald Brown	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	George Conway	Attorney-Client
Email	PDV USA/Citgo Legal Representation	6/15/20	David Rivera	Michael Delarco	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Michael DeLarco	Attorney-Client
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	David Schwartz	Attorney-Client
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Joseph Tacopina	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Howard Magaliff	Attorney-Client
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Daniel Gildin and David Kaufmann	Attorney-Client
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Daniel Gildin and David Kaufmann	Attorney-Client
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Marc Rapaport	Attorney-Client
Email	PDV USA/Citgo Legal Representation	9/25/20	David Rivera	Oren Giskan, Jason Solotaroff, Catherine Anderson	Attorney-Client
Email	PDV/USA Citgo Legal Representation	9/25/20	David Rivera	Adam Klein	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/26/20	David Rivera	Daniel Gildin and David Kaufmann	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/26/20	David Rivera	Howard Magaliff	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/27/20	David Rivera	Howard Magaliff	Attorney-Client
Email	Re: PDV USA/Citgo Legal Representation	9/28/20	David Rivera	Daniel Gildin	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	9/29/20	David Rivera	Howard Magaliff	Attorney-Client
Email	RE: PDV USA/Citgo Legal Representation	10/16/20	David Rivera	Howard Magaliff	Attorney-Client
Email	Re: PDV USA/Citgo Legal Representation	10/17/20	David Rivera	Jason Solotaroff	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	RE: PDV USA/Citgo Legal Representation	1/15/21	David Rivera	Howard Magaliff	Attorney-Client
Email	Fwd: RE: PDV USA/Citgo Legal Representation	1/19/21	David Rivera	Lori Weems Evers	Attorney-Client
Email	RE: PDV USA v. Interamerican	9/29/20	Daniel Gildin	David Rivera	Attorney-Client
Email	FW: PDV USA v. Interamerican	10/2/20	Daniel Gildin	David Rivera	Attorney-Client
Email	RE: FW: PDV USA v. Interamerican	10/12/20	Daniel Gildin	David Rivera	Attorney-Client
Email	RE: FW: PDV USA v. Interamerican	10/16/20	Daniel Gildin	David Rivera	Attorney-Client
Email	RE: PDV USA v. Interamerican Consulting	5/22/20	David Rivera	Louis Fogel	Attorney-Client
Email	Fwd: Rivera/PDV USA – Consulting Agreement	5/18/20	David Rivera	Len.Collins@gmail.com	Attorney-Client
Email	Fwd: PDV USA, Inc. v. Interamerican Consulting Inc.	5/18/20	David Rivera	Felix Lasarte	Attorney-Client
Email	Re: FW: PDV USA v. Interamerican	10/2/20	David Rivera	Daniel Gildin	Attorney-Client
Email	Re: FW: PDV USA v. Interamerican	10/12/20	David Rivera	Daniel Gildin	Attorney-Client
Email	Re: FW: PDV USA v. Interamerican	10/16/20	David Rivera	Daniel Gildin	Attorney-Client
Email	Re: PDV USA Opposition to Motions to Dismiss/Strike	1/26/21	Lee Boyd	David Rivera, Jeff Feldman and David Hecht	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	FW: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Motion for Extension of Time to File Answer	8/3/21	Lee Boyd	David Rivera and David Hecht	Attorney-Client
Email	Re: Retainer Letter Signature Page	8/24/20	David Hecht	David Rivera, Jeff Feldman, Lee Boyd, Inirida Cervantes and Selina Kyle	Attorney-Client
Email	FW: PDV USA v. Interamerican	10/21/20	Lee Boyd	David Rivera, Jeff Feldman and David Hecht	Attorney-Client
Email	Re: PDV USA v. Interamerican	10/21/20	David Rivera	Lee Boyd, Jeff Feldman and David Hecht	Attorney-Client
Email	Fwd: PDV USA v. Interamerican	7/1/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Re: PDV USA v. Interamerican	7/1/21	Lee Boyd	Sarah Wastler, Michael Gottlieb, Jeffrey Korn, Pia Williams Keevil and Shira Feldman	Attorney-Client
Email	Re: PDV USA v. Interamerican	6/30/21	Lee Boyd	Sarah Wastler, Michael Gottlieb, Jeffrey Korn, Pia Williams Keevil and Shira Feldman	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: PDV USA v. Interamerican	6/28/21	Lee Boyd	Sarah Wastler, Michael Gottlieb, Jeffrey Korn, Pia Williams Keevil and Shira Feldman	Attorney-Client
Email	Fwd: PDV USA v. Interamerican	7/1/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: Tweets and Sanctions Motion	7/1/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: PDV USA v. Interamerican	7/1/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Counterclaim 2	7/2/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: PDV USA v. Interamerican	7/29/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: PDV USA v. Interamerican	7/29/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: Contrato de Cesion a Petroleos de Venezuela, S.A. (PDV USA – Interamerican Consulting)	9/27/20	David Rivera	Jeff Feldman	Attorney-Client
Email	Fwd: PDV USA Summons	8/12/20	David Rivera	Drive056@fiu.edu	Attorney-Client
Email	Re: FW: David Rivera/PDV USA, Inc.	6/6/20	David Rivera	Inirida Cervantes and Jeff Feldman	Attorney-Client
Email	Fwd: PDV USA Summons	5/13/20	David Rivera	Drive056@fiu.edu	Attorney-Client
Email	RE: Citgo/PDV USA Assignment Proposals	12/2/20	David Rivera	Jeff Feldman	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	PDV Contract Assignmnet	9/27/20	David Rivera	Jeff Feldman	Attorney-Client
Email	Re: Updated Motions and Declaration	12/18/20	Shira Feldman	Alan Alvela, David Rivera, Jeff Feldman and Lee Boyd	Attorney-Client
Email	RE: Updated Motions and Declaration	12/18/20	Jeff Feldman	Shira Feldman and David Rivera	Attorney-Client
Email	Re: Updated Motions and Declarations	12/18/20	Shira Feldman	Jeff Feldman and David Rivera	Attorney-Client
Email	RE: PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/10/20	Inirida Cervantes	David Rivera and Lee Boyd	Attorney-Client
Email	Re: PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/10/20	Lee Boyd	Inirida Cervantes and David Rivera	Attorney-Client
Email	Re: PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/10/20	Lee Boyd	David Rivera and Inirida Cervantes	Attorney-Client
Email	RE: PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/10/20	Inirida Cervantes	Lee Boyd and David Rivera	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: PDVSA/PDV USA / Phone Call?	11/27/20	Jeff Feldman	Shira Feldman, David Rivera, Lee Boyd and Alan Alvela	Attorney -Client
Email	Re: PDV Contract Assignmnet	11/27/20	Shira Feldman	David Rivera, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client
Email	Re: PDV USA Assignment Email 1	11/27/20	Shira Feldman	David Rivera, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client
Email	Re: PDVSA/PDV USA / Phone Call?	11/28/20	Lee Boyd	David Rivera, Shira Feldman, Jeff Feldman and Alan Alvela	Attorney -Client
Email	Re: PDVSA/PDV USA / Phone Call?	11/30/20	Shira Feldman	Lee Boyd, David Rivera, Jeff Feldman and Alan Alvela	Attorney -Client
Email	Re: PDVSA/PDV USA / Phone Call?	11/30/20	Jeff Feldman	Shira Feldman, Lee Boyd, David Rivera, Alan Alvela and Inirdia Cervantes	Attorney -Client
Email	Re: Interamerican Consulting Contract	12/1/20	Shira Feldman	David Rivera, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client
Email	Re: Citgo/PDV USA Assignment Proposals	12/2/20	Shira Feldman	David Rivera, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: Certified English Translations	12/2/20	Shira Feldman	David, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Re: Certified English Translations	12/9/20	Shira Feldman	David, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Updated Motions and Declaration	12/17/20	Alan Alvela	David Rivera, Jeff Feldman, Lee Boyd and Shira Feldman	Attorney-Client
Email	Re: Updated Motions and Declaration	12/18/20	Alan Alvela	David Rivera, Jeff Feldman, Lee Boyd and Shira Feldman	Attorney-Client
Email	Re: PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/9/20	Inirida Cervantes	David Rivera and Lee Boyd	Attorney-Client
Email	Draft MTD brief	9/25/20	Lee Boyd	David Rivera and Jeff Feldman	Attorney-Client
Email	RE: Draft MTD brief	9/26/20	Jeff Feldman	Lee Boyd and David Rivera	Attorney-Client
Email	RE: Draft MTD brief	9/27/20	Jeff Feldman	Lee Boyd and David Rivera	Attorney-Client
Email	Re: Draft MTD brief	9/27/20	Lee Boyd	Jeff Feldman and David Rivera	Attorney-Client
Email	Re: Revised Draft MTD Letter	9/27/20	Jeff Feldman	Shira Feldman, David Rivera and Lee Boyd	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: Revised Draft MTD Letter	9/27/20	Lee Boyd	David Rivera, Jeff Feldman and Shira Feldman	Attorney-Client
Email	Re: PDV USA Letter Response	10/6/20	Jeff Feldman	David Rivera and Lee Boyd	Attorney-Client
Email	Fwd: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Order	10/8/20	Lee Boyd	Jeff Feldman and David Rivera	Attorney-Client
Email	FW: Contrato de Cesion a Petroleos de Venezuela, S.A. (PDV USA – Interamerican Consulting)	10/9/20	Jeff Feldman	Lee Boyd and David Rivera	Attorney-Client
Email	FW: Documento de Cesion – Contrato de Servicios Profesionales de Consultoria	10/9/20	Jeff Feldman	Kathryn (Lee) Boyd and David Rivera	Attorney-Client
Email	Re: Documento de Cesion – Contrato de Servicios Profesionales de Consultoria	10/9/20	Lee Boyd	David Rivera, Jeff Feldman, Alan Alvela and Shira Feldman	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: New filings in PDV USA, Inc. v. Interamerican Consulting Inc.: TRANSCRIPT of Proceedings re: CONFERENCE held on 10/8/2020 before Judge John G. Koeltl. Court Reporter/Transcriber: Michael McDaniel, (212) 805-0300. Transcript may be viewed at the	10/13/20	Lee Boyd	David Rivera	Attorney-Client
Email	Re: PDV USA v. Interamerican	10/22/20	Lee Boyd	David Rivera and Jeff Feldman	Attorney-Client
Email	FW: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Amended Complaint	10/30/20	Lee Boyd	Jeff Feldman and David Rivera	Attorney-Client
Email	Re: Activity in Case 1:20-cv-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Amended Complaint	10/30/20	Jeff Feldman	Lee Boyd and David Rivera	Attorney-Client
Email	Re: Activity in Case 1:20-cv-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Amended Complaint	11/6/20	Jeff Feldman	Lee Boyd and David Rivera	Attorney-Client

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Email	RE: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Amended Complaint	11/9/20	Jeff Feldman	Lee Boyd and David Rivera	Attorney -Client
Email	PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/9/20	Inirida Cervantes	David Rivera and Kathryn (Lee) Boyd	Attorney -Client
Email	Re: PDV USA, Inc. v. Interamerican Consulting Inc. – Conference Call with Jeff Feldman	11/10/20	David Rivera	Inirida Cervantes and Kathryn (Lee) Boyd	Attorney -Client
Email	RE: PDVSA Ad Hoc Board Enabling Statute	11/20/20	David Rivera	Jeff Feldman and Lee Boyd	Attorney -Client
Email	Fwd: PDV Contract Assignment	11/27/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client
Email	PDV USA Assignment Email 1	11/27/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client
Email	PDV USA Assignment Email 2	11/27/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client
Email	PDV USA Assignment Email 3	11/27/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney -Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: PDVSA/PDV USA / Phone Call?	11/27/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Fwd: Interamerican Consulting Contract	12/1/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Ad Hoc Board Power Point Slide on Interamerican Contract	12/1/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Citgo/PDV USA Assignment Proposals	12/2/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Re: Certified English Translations	12/9/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Re: Updated Motions and Declaration	12/17/20	David Rivera	Alan Alvela, Jeff Feldman, Lee Boyd and Shira Feldman	Attorney-Client
Email	Re: FYI	12/18/20	David Rivera	Lee Boyd, Jeff Feldman, Shira Feldman and Alan Alvela	Attorney-Client
Email	Re: Updated Motions and Declaration	12/18/20	David Rivera	Shira Feldman, Jeff Feldman, Lee Boyd and Alan Alvela	Attorney-Client
Email	Re: Revised Draft MTD Letter	9/27/20	David Rivera	Jeff Feldman, Shira Feldman and Lee Boyd	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Re: PDV USA Letter Response	10/5/20	David Rivera	Lee Boyd and Jeff Feldman	Attorney-Client
Email	Re: Documento de Cesion – Contrato de Servicios Profesionales de Consultoria	10/9/20	David Rivera	Lee Boyd and Jeff Feldman	Attorney-Client
Email	Re: Documento de Cesion – Contrato de Servicios Profesionales de Consultoria	10/9/20	David Rivera	Lee Boyd, Jeff Feldman, Alan Alvela and Shira Feldman	Attorney-Client
Email	Fwd: New filings in PDV USA, Inc. v. Interamerican Consulting Inc.: TRANSCRIPT of Proceedings re: CONFERENCE held on 10/8/2020 before Judge John G. Koeltl. Court Reporter/Transcriber: Michael McDaniel, (212) 805-0300. Transcript may be viewed at the	10/13/20	David Rivera	Lee Boyd	Attorney-Client
Email	FW: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Order on Motion for Extension of Time to Answer	8/4/21	Lee Boyd	David Rivera	Attorney-Client
Email	Re: Chronology and False Statements	9/27/21	Lee Boyd	David Rivera and David Hecht	Attorney-Client
Email	RE: Chronology and False Statements	10/18/21	David Hecht	David Rivera and Lee Boyd	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	FW: Media query for Rep. Rivera / PDV USA	1/28/21	Lee Boyd	Jeff Feldman and David Rivera	Attorney-Client
Email	Re: Response Thoughts	2/4/21	Lee Boyd	David Rivera, Jeff Feldman, Shira Feldman and Alan Alvela	Attorney-Client
Email	Re: US Sanctions defense	2/5/21	Lee Boyd	David Rivera and Jeff Feldman	Attorney-Client
Email	Re: US Sanctions defense	2/5/21	Lee Boyd	David Rivera and Jeff Feldman	Attorney-Client
Email	Re: FW: Media query for Rep. Rivera / PDV USA	1/28/21	David Rivera	Lee Boyd and Jeff Feldman	Attorney-Client
Email	Wire Transfer and Rescission Documents	1/29/21	David Rivera	Jeff Feldman, Lee Boyd, Shira Feldman and Alan Alvela	Attorney-Client
Email	Response Thoughts	2/1/21	David Rivera	Lee Boyd, Jeff Feldman, Shira Feldman and Alan Alvela	Attorney-Client
Emails	Re: US Sanctions defense	2/5/21	David Rivera	Lee Boyd and Jeff Feldman	Attorney-Client
Email	PDV USA FARA Filing	2/7/21	David Rivera	Lee Boyd, Jeff Feldman, Shira Feldman and Alan Alvela	Attorney-Client
Email	Citgo PDV USA Amended Complaint	8/11/21	David Rivera	Lee Boyd and Jeff Feldman	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	RE: Citgo/PDV USA Assignment Proposals	12/2/20	Jeff Feldman	David Rivera	Attorney-Client
Email	Re: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Amended Complaint	11/9/20	Inirida Cervantes	Jeff Feldman and David Rivera	Attorney-Client
Email	RE: PDV USA v. Interamerican Consulting	5/21/20	Louis Fogel	David Rivera	Attorney-Client
Email	FW: PDV USA v. Interamerican	5/21/20	Lori Evers	David Rivera	Attorney-Client
Email	RE: PDV – Confidential Communication	5/19/20	David Rivera	Tucker Byrd and batista007@gmail.com	Attorney-Client
Email	Rivera/PDV USA – Consulting Agreement	5/14/20	Inirida Cervantes	David Rivera and Jeff Feldman	Attorney-Client
Email	Re: Rivera/PDV USA – Consulting Agreement	5/15/20	Lori Evers	David Rivera	Attorney-Client
Email	RE: PDV USA, Inc. v. Interamerican Consulting, Inc.	5/18/20	Felix Lasarte	David Rivera	Attorney-Client
Email	Draft of Letter to Guillermo Blanco at PDV USA Inc. _ 7-22-19.pdf	7/22/19	Jeff Feldman	David Rivera	Attorney-Client
Email	FW: PDV USA, Inc./ Inter-American Consulting Inc. – Proposed Letter to Guillermo Blanco	12/20/19	Inirida Cervantes	David Rivera	Attorney-Client and Work Product

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	Fwd: Draft of Letter to Guillermo Blanco at PDV USA Inc._7-22-19.pdf	7/22/19	David Rivera	Esther Nuhfer	Attorney-Client
Email	Fwd: FW: PDV USA, Inc./Inter-American Consulting Inc. – Proposed Letter to Guillermo Blanco	12/20/19	David Rivera	Esther Nuhfer	Attorney-Client
Email	Citgo: As discussed, do you have any problem with this verbiage?	12/18/18	David Rivera	Jeff Feldman	Attorney-Client
Email	FW: Inter American Consulting/PDV USA, Inc.: Draft Retainer Letter	6/17/19	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: PDV USA Final Report.docx	7/19/19	David Rivera	Jeff Feldman	Attorney-Client
Email	PDV USA Inc. – 2019 Delaware Annual Franchise Tax Report – filed 01_14_20.pdf	3/11/20	Jeff Feldman	David Rivera	Attorney-Client
Email	Fwd: Board of Directors PDV USA, Inc.	1/8/20	David Rivera	Esther Nuhfer	Attorney-Client
Email	FW: engagement agreement and bios	8/14/20	Jeff Feldman	David Rivera	Attorney-Client
Email	RE: ALERT: Contact Received From Your FindLaw Website	9/25/20	Howard Magaliff	David Rivera	Attorney-Client
Email	RE: ALERT: Contact Received from Your FindLaw Website	9/25/20	Daniel Gildin	David Rivera, David Robbins and David Kaufmann	Attorney-Client

Type of Document	Subject Matter	Date of Document	Author	Addressee(s)	Privilege Asserted
Email	FW: Activity in Case 1:20-cv-03699-JGK PDV USA, Inc. v. Interamerican Consulting Inc. Amended Complaint	11/9/20	Jeff Feldman	Inirida Cervantes and David Rivera	Attorney-Client
Email	Re: Great Wine	12/25/20	Jeff Feldman	David Rivera and Susan Latham	Attorney-Client
Email	RE: FARA Counsel	1/28/21	Matthew Sanderson	David Rivera	Attorney-Client
Email	RE: Response Thoughts	2/3/21	Jeff Feldman	David Rivera	Attorney-Client
Email	Wire	4/20/21	Susan Latham	David Rivera and Jeff Feldman	Attorney-Client
Email	RE: Draft Counter-claim	8/18/21	Ralph Patino	David Rivera	Attorney-Client
Email	Privileged emails with counsel	Beginning 5/19/20 through present	David Rivera	Tucker Byrd, Min Cho, Jason Johnson, Andrew Domingoes and Paralegals	Attorney-Client

Dated: March 3, 2022.

/s/ Jason Johnson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 3, 2022, a copy of the foregoing has been furnished via electronic mail to all counsel of record as follows:

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/s/ Tucker H. Byrd, Esq.

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